

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY <b>Caption in Compliance with D.N.J. LBR 9004-2(c)</b>  Robert Manchel, Esq. 1 Eves Drive, Suite 111 Marlton, NJ 08053 Attorney for Debtor RM-1141	
In Re:  Karen Prokapus	Case No. 16-14196MBK  Judge:  Chapter 13

**CHAPTER 13 DEBTOR'S CERTIFICATION IN OPPOSITION TO**  
**X CREDITOR'S MOTION or CERTIFICATION OF DEFAULT**  
**TRUSTEE'S MOTION or CERTIFICATION OF DEFAULT**

The debtor in the above-captioned chapter 13 proceeding hereby objects to the following **(choose one)**:

1.   X   Motion for Relief from the Automatic Stay filed by Shellpoint Mortgage / Wilmington Savings Fund Society, creditor. A hearing has been scheduled for 9/5/2017, at 9:00 a.m.

OR

           Motion to Dismiss filed by the Standing Chapter 13 Trustee. A hearing has been scheduled for                    at                    a.m.

OR

           Certification of Default filed by                   , creditor. I am requesting that a hearing be scheduled on this matter.

OR

           Certification of Default filed by Standing Chapter 13 Trustee.

I am requesting that a hearing be scheduled on this matter.

2. I am objecting to the above for the following reasons (**choose one**):

\_\_\_\_\_ Payments have been made in the amount of \$\_\_\_\_\_, but have not been accounted for. Documentation in support is attached hereto.

OR

\_\_\_\_\_ Payments have not been made for the following reasons and debtor proposes repayment as follows (**explain your answer**):

OR

**X** Other: Seneca Mortgage Servicing and I entered into a loan modification agreement. Thereafter, the mortgage servicing was assigned and transferred to Shellpoint, which initially complied with our agreement and accepted our loan modification payments. However, when our account was subsequently handled by another Shellpoint representative, they refused our payments and compliance with our agreement. We intend to file a Cross Motion to Compel Shellpoint to Comply with our loan modification agreement. I respectfully request that the movant's motion be denied.

3. This certification is being made in an effort to resolve the issues raised by the creditor in its motion.
4. I certify under penalty of perjury that the foregoing is true and correct.

Date: \_\_\_\_\_

/s/ Karen Prokapus, Debtor  
Karen Prokapus, Debtor